

PRIVACY POLICY

INTRODUCTION

The General Data Protection Regulation (GDPR), which started on May 25, 2018, provides a modernized compliance framework based on the responsibility for data protection in Europe.

In this context, and in compliance with the determinations contained in this regulation and in with the explanatory note given by the National Data Protection Commission (CNPD), [more info](#), Think Future has taken the following initiatives:

- 1. Information to data subjects:** in compliance with the new rules of the GDPR, all printed, digital and other information texts used were revised and include the additional information required by the GDPR;
- 2. Exercise the rights of data subjects:** Think Future, Ida reviewed internal procedures data holders, including for the purposes of exercising the new rights (provided that the portability and oblivion), in order to ensure compliance formalities provided for in the GDPR;
- 3. Data holders' consent:** Think Future, Ida has implemented a set of procedures that enable it to verify the form, circumstances and terms in which it was and is obtained consent of the data subjects and, if applicable, obtaining new consents;
- 4. Sensitive data:** assessed the categories of personal data processed, in order to identify the possible processing of sensitive data (special categories of data under the GDPR) determined the applicable requirements;
- 5. Documentation and recording of treatment activities:** the activities related to the processing of personal data are documented, either by creating a data processing activities, either through the implementation of internal procedures appropriate;
- 6. Subcontractors contracts:** contracts with subcontractors have been updated to include the set of mandatory information under the GDPR requirements.

7. Data Protection Officer: for the necessary cases we've created a specific mail address(rgpd@thinkfuture.pt).

8. Data treatment security: Think Future, lda reviewed all policies, practices and internal measures to confirm the level of safety of appropriate data treatment, implementing those that are necessary;

9. Data protection from design and impact assessment: Within the scope and context of the was evaluated in the context of the operation of Think Future, lda and its activity, the type of personal data processing designed for the near future, in order to analyze its nature and context, as well as the potential risks to data subjects.

10. Notification of security breaches: Think Future, lda shall, when applicable, will report to the competent authorities, the CNPD and data subjects, of any personal data that's considered lost, as well as on a case-by-case basis and in accordance with the criticality of the information involved, the processes used for the detection, identification and investigation of the circumstances of the violation, mitigating measures and information flows between responsible and subcontractor.

Your privacy is important to us and we are committed to protecting and safeguarding privacy rights of your data. This document is intended to describe how We collect, use and process your personal data and how we comply with our obligations in accordance with the rules defined in the GDPR.

This Privacy Policy applies to the personal data of the Customers, Suppliers and Users of the Site.

1 – Collected Data

a) CLIENTS

In order for us to provide a better service, it is necessary to collect and use company or contact information, which may be used contracted service. As you access our site, we will also collect certain data from you.

- **How do we collect your data?**

- **Directly** - in the course of the commercial process

- **Third parties** - by indication of a partner company or another that has consent or other sources such as media

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- **Data usage**

The use and processing of your data is intended to ensure the contractual arrangements established.

- **Data sharing**

We will share your data in order to ensure that we present you with a competitive and innovative solutions that meet your needs.

Unless otherwise indicated, we may share your information with any of the companies in our group and associated third parties, such as our service providers to help us meet these goals.

b) **SUPPLIERS**

To guarantee the success of the operations, a set of information will be collected such as: contact of the relevant structures to the process, thus enabling the the contact, as well as all the necessary information to guarantee payment and billing of the services provided.

As you access our site, we will also collect certain data from you.

- **How do we collect your data?**

- **Directly** - the data will be collected when the services are contracted or the services provided.

- **Third parties** - by indication of a partner company or another that has consent or other sources such as media

- **Data usage**

The use and processing of your data is solely intended to ensure the provisions, thus ensuring that the work effectively fulfilling all legal obligations.

- **Data sharing**

Except by your indication, we may share your information with third parties that work within the development of projects

C) WEBSITE USERS

When using our site, we collect a limited amount of data that helps us improve your user experience that includes information such as how you use our website, the frequency with which you access it, the browser used, the area where you access our site, and the language.

Our site offers the functionality of online chat, will collect the data that you provide, consent is requested at the time of submitting the information.

- **How do we collect your data?**

- **Automatically** - through the use of cookies, according to the settings of your browser
- **Directly** - when establishing contact with Think Future, Ida via the website.

- **Data usage**

The use and processing of your data is intended to improve your user experience from our website.

- **Data sharing**

The data collected in the process of using our site is for the exclusive use of Think Future, Ida

2 - Security of collected data

We have taken all reasonable and appropriate steps to protect your personal information that we have of misuse, loss or unauthorized access. We have adapted a set of appropriate technical and organizational measures with encryption systems.

3 - Data storage

Your data will be kept for a period of 2 years, after this period the information will be eliminated from our systems.

4 - Access, Change or Delete your data

You can request access to your information whenever you wish using the email address: rgpd@thinkfuture.pt or via mailing address: Rua do Instituto Industrial, nº16, 1200 -255 Lisboa, upon receipt of your request we will give feedback within a maximum of 2 working days.

5- Responsibility for data processing

The processing of data collected on our site is the exclusive responsibility of:



Headquarters : CEI - Av. do Empresário, 6000-767 Castelo Branco Castelo Branco

Office: Rua do Instituto Industrial nº 16, 1200-255 Lisboa.

Email: now@thinkfuture.pt

DPO ADDRESS:

Email: rgpd@thinkfuture.pt

Endereço: Rua do Instituto Industrial, nº 16, 1200-255 Lisboa

6 - Declaring, Exercising or Defending Rights

It may sometimes be necessary to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with the exercise or defense of rights. Article 9 (2) (f) of the GDPR allows this processing when this "is necessary for the declaration, exercise or defense of a right in a judicial or administrative whenever the courts act in the exercise of their judicial function". This may arise, for example, in cases where we need advice legal proceedings or if we are required by law to keep information as part of a legal process.

7 - Cookies

A "cookie" is a small data file that is stored on your computer. They are used by almost all sites and do not harm your system. We use them to track your activity to help us ensure you get an experience with the number of problems when you visit our website. We can use the cookie information to ensure that we present you with options tailored to your preferences on your next visit. We may also use cookies to analyze traffic and to advertising purposes.

- If you want to check or change the type of cookies you accept, you can usually check the browser settings.
- If you do not wish to receive cookies that are not strictly necessary to perform features of our site, you can self-exclude by changing the settings of your browser.

Learn more at <http://www.allaboutcookies.org/>